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27 February 2004

Docket Management Facility
US Department of Transportation
400 Seventh Street, SW
Nassif Building Room PL-401
Washington, DC 20590-001
<delivered electronically>

Re: Docket Number FAA-2003-16526;
Comments to the Notice of Proposed Rule Making (NPRM) for Stage 4
noise standard.

Who We Are

We are the Citizen Noise Advisory Committee (CNAC) for the Portland International Airport (PDX). We are appointed by regional governments to work on noise abatement issues with PDX. This correspondence represents our majority opinion, which may not necessarily agree with the opinion of Port of Portland management.

Our Concerns and Suggestions

CNAC has 4 major concerns and suggestions to FAA proposed rules for stage 4 aircraft.

Concern 1: Aircraft under 75,000 lbs. max. are excluded from compliance.

Discussion: Consistent with prior stages (i.e., noise regulations in Part 36 covering stages 1-3), FAA proposes to exclude all aircraft under 75,000 lbs. max. certificated weight from compliance with stage 4 requirements. This exemption totally ignores the significant noise contribution by aircraft in this weight category. Ignoring smaller planes is especially troublesome to CNAC because smaller planes can make more noise than larger ones.

For example, at takeoff, which is the most noise intense and disturbing phase of flight, a stage 3 Boeing 747-400 at its maximum certificated gross weight of 820,000 lbs. produces a 83.2 dBA while a stage 2 JetStar business jet at a maximum weight of only 42,000 lbs. produces 88.7 dBA on takeoff.

Suggestion: CNAC suggests that Part 36 regulations be applied to all aircraft, and not just aircraft weighing more than 75,000 pounds.

Concern 2: The Stage 4 aggregate dBA measure is misleading.

Discussion: CNAC has a most serious concern with how the amount of stage 4 noise reduction is being conveyed to the public. Many people understand that a 10 dBA reduction in noise means cutting the noise in half. But the "cumulative" metric that FAA has constructed isn't reducing noise events by that magnitude.

The FAA metric sums noise events that happen at two different times, which may be hours, days, or even months apart. The misleading metric adds three different measures – flyover, sideline, and approach noise. Stage 4 targets for reduction for two of the measures, sideline and flyover, are a mere 1 dBA each. 3 dBA is the commonly accepted minimum human threshold to discern noise levels with different intensities.

Therefore, it is fair to say that for two of the three Stage 4 measures, the noise reduction is so small that it cannot be registered by the human ear.

With a proposed cumulative stage 4 reduction of 10 dBA based on 8dBA on approach and the total of 2dBA for flyover and sideline, it is clear to us that while there is a substantial reduction target for aircraft approach, the mere 1 db target reduction for takeoff, the most significant noise producing phase of flight, will result in essentially undetectable relief.

Suggestions: We urge the FAA to break out the 10 dBA stage 4 noise reduction into each of its three components specifically underscoring that stage 4 aircraft will not be half as noisy. We urge FAA to reallocate a higher portion of the proposed 10 dBA reduction toward noise associated with aircraft takeoff.

Concern 3: 10 dBA aggregate reduction in noise should be 14 dBA.

Discussion: CNAC is deeply troubled that the FAA is willing to require only a 10 dBA aggregate reduction of stage 4 requirements over stage 3. This is a cumulative requirement that is grossly inadequate. According to Airport Council International – North America (ACI-NA), many existing aircraft already meet or exceed the new standard.

If some planes already in service meet a 14 dBA aggregate reduction, then such a target must be feasible technically and economically.

Suggestion: CNAC recommends a target of 14 dBA cumulative noise reduction for Stage 4.

Concern 4: Plans for Stage 4 do not include retiring Stage 3 aircraft.

Discussion: Previous Part 36 rules called for the retirement or refurbishment of aircraft failing to meet the new standard. A benefit of Stage 3 was the hush-kitting of some Stage 2 aircraft and the retirement of others. Stage 4 rules do not require Stage 3 aircraft to be modified or taken out of service.

Suggestion: CNAC suggests that the principle of moving the fleet forward to a new standard be maintained for Stage 4.

Summary and Conclusion

In FAA Part 36 (34 FR 18355 Nov. '69) Noise Standards: Aircraft Type and Airworthiness Certification, which sets the regulatory standards for noise emission, the FAA had made the following comments in response to input from the public:

- ❖ "The FAA agrees that available technology must be applied in the reduction of aircraft noise."

- ❖ "The FAA is firmly committed to lowering the prescribed noise limits as fast as technology reasonably permits."
- ❖ "The FAA believes that a major precondition of responsive local land use decisions around airports is Federal action to firmly contain at predictable and definable levels, the source noise of aircraft."

CNAC strongly encourages the FAA to apply its own advice and to be as aggressive as is technically feasible in setting Stage 4 targets for reduction in aircraft noise.

On behalf of CNAC,

David King, Chair
CNAC

Cc: Peggy McNees – Noise Program Manager, PDX
Anne Mitchell – Community Affairs Aviation Program Manager, Port of Portland
Chris Corich – Director of Operations & Maintenance, PDX
Lise Glancy – Regional Affairs Manager, Port of Portland
Oregon and Washington Federal Congressional Delegations